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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 9, 2002

Ms. Laurie Kral
Office of Air Quality Program
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Andy Ginsburg, Administrator
Air Quality Division
Oregon Department of Environmental Quality
811 SW Sixth Avenue
Portland, Oregon 97204

Mr. Russell Jim
Yakama Indian Nation
P.O. Box 151
Toppenish, Washington 98948

Mr. Gary Burke, Chairman
Confederated Tribes of the Umatilla Indian Reservation
P.O. Box 638
Pendleton, Oregon 97801

RECEIVED
AUG 14 2002

EDMC

Dear Ms. Kral, Messrs. Ginsburg, Jim and Burke:

Issuance of Significant Modification to the Hanford Site Title V Air Operating Permit (AOP)

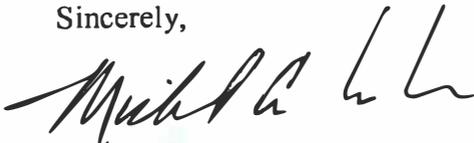
The Washington State Department of Ecology (Ecology) formally issues the enclosed significant modification to the Hanford Site Title V AOP as Revision B. The terms and conditions of this revision become effective immediately. Enclosure 1 provides affected pages (significant modifications, administrative amendments, and off-permit changes) which are to be replaced or inserted into the AOP. Enclosure 2 provides Department of Energy's (DOE) application document and supporting materials.

Ms. Kral, Messrs. Ginsburg, Jim and Burke
August 9, 2002
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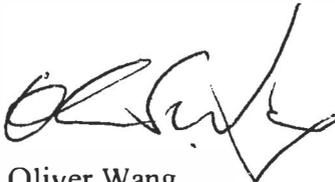
DOE's request for significant modification contains changes that are related to monitoring, reporting frequencies, and recordkeeping. This significant modification also contains the addition of new sunseting language for monitoring and associated record-keeping requirement for emission units that are not operating, and a clarification of visible emissions compliance standard for the following units: Hanford Site Asbestos Landfill, 181 B-66 Underground Storage Tank, 600 G-6290 600 Area Gas Distribution, and 283-W Water Treatment Plant (Chlorine Tank).

All WAC-401-725 requirements were followed for review and subsequent issuance of this significant modification. The public participation and comment period started on June 10, 2002, for 30 days, in accordance with WAC 173-401-800 to 820. There were no public comments received by Ecology. If you have any questions regarding the issuance of this modification, please contact Oliver Wang, of my staff, at (509) 736-3040.

Sincerely,



Mike Wilson
Program Manager
Nuclear Waste Program



Oliver Wang
Professional Engineer
Nuclear Waste Program

MW:OW:nc

Enclosure 1: Revision B (Significant Modification, August 2002)

Enclosure 2: DOE's application for significant modification and supporting materials.

cc w/enclosures:

Dale Jackson
United States Department of Energy
Richland Operations Office
P.O. Box 550, MS: A4-52
Richland, Washington 99352

Ms. Kral, Messrs. Ginsburg, Jim and Burke
August 9, 2002
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P.O. Box 450, MS: H6-60
Richland, Washington 99352

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Olympia, Washington 98504-7827

Barry Cum
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3000 George Washington Way
Richland, Washington 99352

Administrative Record: Hanford AOP

cc w/o enclosures:

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P.O. Box 47600
Olympia, Washington 98504-7600

Joan Woolard, BHI
Chris Kemp, CHG
Brad Atencio, PNNL

Enclosure 1

**Revision B (Significant Modification, Administrative Amendment, and Off-Permit Change
to
Hanford Site Title V Air Operating Permit)**

Consisting of 25 pages, including this coversheet

REVISIONS

Revision A (Minor Modification – issued on 6/11/2002)

Attachment 2 (Health Permit)

Page A-1 to A-228: Add 23 new NOCs for updating Health permit.

(Document References: 02-RCA-085, 02-RCA-0188, 02-RCA-0214, and 02-RCA-0238)

Revision B (Significant Modification – issued on 8/9/2002)

General Terms and Conditions

Page 4: Delete Sections 4.7 and 4.8, and add 4.14 into the table of contents.

Page 16: Change Section 4.3.3 (5) to remove the requirement to send the NOC approval back to the regulatory agencies.

Page 16: Delete Section 4.3.3. (6) as EPA approvals are not tracked anywhere in the AOP.

Page 17: Original 4.3.3. (7) is now 4.3.3. (6).

Pages 22-23: Add sunseting language as Section 4.14 of the General Conditions of the permit to clarify monitoring and associated recordkeeping requirements for emission units that are not operating.

Attachment 1 (Ecology Permit)

Page 1-45: Change the visible emission surveys monitoring requirements in Table 1.7, Miscellaneous Emission Units, as these emission units are extremely unlikely sources of visible emissions, and no visible emissions have been observed during the numerous visible emission surveys completed during the compliance period.

Page 1-46: Correct typographical error by changing “3 working days” to “30 days” in the second sentence of Section 2.2.

Attachment 2 (Health Permit)

Delete the following six emission units from Attachment 2:

Page 2-81: 200 P-276S141 001, Emission Unit ID: 482
Delete this emission unit. A letter of closure (AIR 02-512) has been received from WDOH.

Page 2-83: 200 W-PORTEX-023, Emission Unit ID: 479
Delete this emission unit from the permit because this portable exhauster has been replaced.

Page 2-163: 300 P-309PRTR-001. Emission Unit ID: 195
Delete this emission unit from the permit because a letter of closure (02-RCA-0185) has been mailed.

Page 2-180: 300 EP-3020-01-S, Emission Unit ID: 307
Delete NOC, Shortform Approval, 12/16/97, WDOH NOC ID 248 from permit because the NOC has never been used and there are no plans to use it in the future.

Page 2-203: Hanford Sitewide W-PORTEX 007, Emission Unit ID: 455
Delete NOC, ERC Team Meeting (Minutes CCN 053924), 10/24/97, WDOH NOC ID 239 from permit because the NOC has never been used and there are no plans to use it in the future.

Page 2-223: 300 diffuse/fugitive emissions, Emission Unit ID: 443
Delete NOC, Shortform Approval, 7/7/99, WDOH NOC ID 375 from permit because the activity has been completed.

(Document Reference: 02-RCA-0327)

Administrative Amendments

General Terms and Conditions

Page 9: Add PN Services (Document Reference: 02-RCA-0327).

Pages 13 & 15: Address change for Benton Clean Air Authority (Document Reference: 02-RCA-0327).

Page 16: Change AOP Semiannual Report submittal date from August 15 to September 15 (Document Reference: 02-RCA-0187)

Page 17: Modify Item 1. (Document Reference: 02-RCA-0262).

Page 20: Delete Sections 4.7 and 4.8. The original Sections 4.9 and 4.10 become the new 4.7 and 4.8 (Document Reference: 02-RCA-0327).

Page 21: The original Sections 4.11, 4.12, 4.13 and 4.14 become 4.9, 4.10, 4.11, and 4.12 (Document Reference: 02-RCA-0327).

Page 22: The original Section 4.15 become 4.13 (Document Reference: 02-RCA-0327).

Attachment 1 (Ecology Permit)

Page 1-3: Modify Section 1.1 (Document Reference: 01-RCA-437).

Page 1-5: Add items to Internal Combustion Engines, 500 Horsepower and Greater (Document Reference: 01-RCA-373).

Page 1-8: Add footnote for WAC 173-400-040(3)(a) (Document Reference: 02-RCA-0327).

Page 1-9: Correct a typo (“of” to “or”) for WAC-400-040(7).

Page 1-10: Add footnotes for WAC 173-400-040(8)(a) and 173-400-040 (Document Reference: 02-RCA-0327).

Page 1-17: Add items to Internal Combustion Engines, 500 Horsepower and Greater (Document Reference: 01-RCA-373, also see changes for Page 1-5).

Page 1-45: Add WAC 173-400-040(1) and (6) requirements to Table 1.7 (Document Reference: 02-RCA-0327).

Page 1-46: Clarify Tier 2 (Document Reference: 01-RCA-437) and Tier 3 (Document Reference: 02-RCA-0327).

Hanford AOP Statement of Basis

Ecology Statement of Basis – 18: Condition completed for 300 EP-325-01-S on 10/17/01 (Document Reference: 02-RCA-005).

Ecology Statement of Basis – 23: Add PN Services (Document Reference: 02-RCA-0327).

Ecology Statement of Basis – 24: Clarify Item 14 for fugitive emissions and fugitive dust.

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- all Port of Benton facilities
- US Ecology, Inc. commercial low-level radioactive waste burial site
- Kaiser Aluminum and Chemical Corporation extrusion press located in the 313 Building
- Siemens Power Corporation, Nuclear Division
- Livingston Rebuild Center, Inc.
- *PN Services*

The Hanford Site was acquired by the federal government in 1943 and for many years was dedicated primarily to the production of plutonium for national defense and the management of the resulting wastes. With the shutdown of the production facilities in the 1970s and 1980s, missions were redirected to site cleanup and decommission, and diversified to include research and development in the areas of energy, waste management, and environmental restoration. Decommissioned facilities or emission points are those that cannot be operated as is, and are not planned to ever operate again. In an extremely unlikely event that a decommissioned facility or emission point is reactivated, an applicable requirements assessment must first be completed.

4.0 General Conditions

4.1 Permit Renewal and Conditions

This permit is issued for a fixed term of 5 years from the effective date of initial issuance. The permittee's right to operate this Chapter 401 source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least 6 months but no earlier than 18 months prior to the date of permit expiration. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by Ecology, Health, and BCAA on the renewal application. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by Ecology, Health, or BCAA any additional information identified as being needed to process the renewal application. The application for renewal shall include the current permit number, the appropriate renewal fee, description of permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. The renewal application should be sent to:

Program Manager
Nuclear Waste Program
State of Washington Department of Ecology.
1315 W. 4th Avenue
Kennewick, WA 99336-6018

and

Section Head
Air Emissions and Defense Wastes
Division of Radiation Protection
State of Washington Department of Health
Airdustrial Park, Bldg 5, PO Box 47827
Olympia, WA 98504-7827

and

Control Officer
Benton Clean Air Authority
114 Columbia Point Drive, Suite C
Richland, WA 99352

or other address, as directed by the agencies.

[WAC 173-401-610, WAC 173-401-710(1), WAC 246-247-060(6) (state only)]

or other address as directed by the EPA.

Reports, notifications, and compliance certifications regarding regulated asbestos activities shall be submitted as specified in Attachment 3 to:

Control Officer
Benton Clean Air Authority
114 Columbia Point Drive, Suite C
Richland, WA 99352

and the EPA at the address shown above or other address as directed by the BCAA or EPA.

Reports, notifications, and compliance certifications regarding regulated open burning activities shall be submitted as specified in Attachment 3 to:

Control Officer
Benton Clean Air Authority
114 Columbia Point Drive, Suite C
Richland, WA 99352

or other address as directed by the BCAA.

The permittee shall promptly, upon discovery, report to Ecology, Health or BCAA, any material error or omission in these records, reports, plans or other documents.

Any application form, report, or compliance certification submitted to Ecology, Health, or BCAA pursuant to this permit shall contain a certification of truth, accuracy, and completeness by a responsible official. All certifications shall be in accordance with the requirements of WAC 173-401-520 and WAC 173-401-615.

4.3.1 Annual NESHAP report

The annual report consists of the annual Radionuclide Air Emissions Report For the Hanford Site required by 40 CFR 61.94 and WAC 246-247 and includes the following additional information per WAC 246-247-080(3):

1. The results of emission measurements for those emission units subject only to periodic confirmatory measurements.
2. Wind rose or joint frequency table.
3. Annual average ambient temperature.
4. Annual average emission unit gas temperature, if available.
5. Annual total rainfall.
6. Annual average emission unit flow rate and total volume of air released during the calendar year.

In accordance with WAC 246-247-080(3) the report is due by June 30 for the previous calendar year's operation. If the additional information is available in another annual report, the licensee may provide a copy of that report along with the information requirements listed above.

[WAC 246-247-080(3) (state only)]

4.3.2 Annual Air Emission Inventory

The annual emission inventory is submitted to Ecology (when required) no later than 105 days after the end of the calendar year.

[WAC 173-400-105]

4.3.3 Semiannual Reports

Semiannual reports will be submitted by *September* 15th and by March 15th. The semiannual report submitted by *September* 15th will contain information for the period from January 1 through June 30. The semiannual report submitted by March 15th will contain information for the period from July 1 through December 31. The semiannual reports will be in addition to the currently submitted reports. There are no semiannual reporting requirements for insignificant emission units defined by WAC 173-401-530, except those required by Ecology under WAC 173-400-105. Each semiannual report will be certified consistent with WAC 173-401-520.

Each semiannual report will contain the following information for the applicable reporting period (January 1 through June 30, or July 1 through December 31):

1. Each semiannual report will provide a reference to reports submitted to the regulatory agencies as required by General Conditions Section 4.5, Permit Deviation Reporting.
2. Each semiannual report will consist of reports of any required monitoring not previously submitted according to Section 4.3 or reference to reports of required monitoring that were submitted during the reporting period.
3. Each semiannual report will contain a summary of any substantiated air emission complaint investigation(s) required in Table 1.2 of Attachment 1 and issued during the reporting period.
4. For all minor radioactive emission points (potential to emit < 0.1 mrem to the maximally exposed individual) listed in Attachment 2, Tables 1.2, 1.3 and 2.1 of this permit, each semiannual report will confirm that any required monitoring was conducted to verify low emissions during the reporting period. The data derived from that monitoring will be reported in the Annual NESHAP Report, (see Section 4.3.1).
5. Each semiannual report will list any new regulatory orders, (e.g. Notice of Construction) imposed during the reporting period by Ecology, or Health.

6. Each semiannual report will include a progress report on the compliance schedules identified in Section 4.10.

[WAC 173-401-615(3)(a)]

4.3.4 Annual Compliance Certification

The initial annual compliance certification will be submitted no later than twelve months following the effective date of the permit. The annual compliance certification will be certified consistent with WAC 173-401-520. The compliance certification will consist of the following:

1. *Each emission unit term or condition listed in Attachments 1 and 2, as well as Attachment 3 for asbestos and open burning;*
2. The compliance status;
3. Whether compliance was continuous or intermittent;
4. The method(s) used to determine the compliance status of the source over the reporting period consistent with WAC 173-401-615(3)(a).
5. Such other facts as Ecology, Health, or BCAA may require to determine the compliance status of the source.

All compliance certifications shall be submitted to Ecology, Health, or BCAA with a copy to EPA at the address shown in Section 4.3 above.

No certification is required for insignificant emission units per WAC 173-401-530(2)(d).

[WAC 173-401-630(5)]

4.4 Inspection and Entry

Upon presentation of appropriate credentials and equipped with appropriate personal protective equipment, the permittee shall allow Ecology, Health, or BCAA, or an authorized representative to perform the following:

1. Enter, at reasonable times, upon the permittee's premises where a Chapter 401 source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit.
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit. Health may require a demonstration of ALARACT at any time. Where controlled access areas will be entered, Ecology, Health, or BCAA shall provide a reasonable advance notice and enter in the presence of a facility representative.
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit.

4.6 Reopening for Cause

The Ecology, and/or Health, or BCAA, acting through Ecology, will reopen and revise this permit, as necessary, in the following circumstances:

- 1) Additional requirements that become applicable to the Hanford Site three or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or any terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).
- 2) Ecology, Health, BCAA, or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- 3) Ecology, Health, BCAA, or the EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Reopenings shall not be initiated before a notice of intent to reopen is provided to the permittee by Ecology at least 30 days in advance of the date that this permit is to be reopened, except that Ecology, Health, or BCAA may provide a shorter time period in the case of an emergency.

All permit conditions remain in effect until such time as Ecology takes final action. Respective regulatory agencies may take temporary corrective measures in cases of material mistakes or potential negative impact to public health.

[WAC173-401-730]

4.7 Monitoring

Under the requirements of WAC 246-247-075(9), Health may conduct an environmental surveillance program to ensure that radiation doses to the public from emission units are in compliance with applicable standards. Health may require the operator of an emission unit to conduct stack sampling, ambient air monitoring, or other testing as necessary to demonstrate compliance with the standards in WAC 246-247-040.

4.8 Compliance Schedules

The schedules in this section are identified pursuant to WAC 173-401-630(3).

NESHAP FFCA (The FFCA Compliance Schedule is a standalone document, see Attachment 4.)

A Federal Facility Compliance Agreement (FFCA) between EPA Region 10 and DOE was signed February 7, 1994. The purpose of the FFCA is to provide a compliance plan and schedule to bring

certain existing Hanford Site stack sampling/monitoring systems into compliance with requirements in 40 CFR 61, Subpart H.

For those schedules of compliance identified in this section, the permittee shall report progress against the compliance schedule on a semiannual basis in accordance with Section 4.3.3. The progress report shall contain the date(s) for achieving compliance, the date(s) when compliance was achieved, and provide an explanation of why any date(s) in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

[WAC 173-401-630(4)]

4.9 New Source Review Applicability

The permittee is not allowed to construct or operate new or modified emission units without prior approval pursuant to the new source review requirements except as allowed by regulations. Additionally, before a deactivated emission unit is re-activated, an applicable requirements assessment shall be performed. This applicable requirements assessment shall include a determination of the applicability of the new source review requirements.

[WAC 173-400-110, WAC 173-460-040 (state only), and WAC 246-247-060 (state only)]

4.10 Emission Standards and Controls for Sources Emitting Gasoline Vapors

Stage 1 requirements are applicable to twenty eastern Washington counties (including Benton County) with new gasoline dispensing facilities greater than 10,000 gallons storage capacity (see Table 1.7 in Attachment 1). Total annual throughput records shall be maintained for the most recent two year period.

[WAC 173-491]

4.11 Stratospheric Ozone Protection

The permittee shall comply with the labeling, procurement, maintenance, service, repair, and disposal standards relevant to stratospheric ozone protection under 40 CFR 82. Records shall be maintained as required.

[40 CFR 82]

4.12 Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r)(7)

This facility is subject to part 68 and shall certify compliance with all requirements of 40 CFR part 68 as part of the annual compliance certification as required by 40 CFR § 70.6(c)(5). This requirement applies to 283-W Water Treatment Plant for the risk management of potential accidental release of Chlorine (see Table 1.7 in Attachment 1).

[40 CFR 68.215]

4.13 Approval Order Terms and Conditions that Become Irrelevant During the Term of this Permit

Nothing herein shall be construed to preclude the permittee from making changes consistent with Chapter 401 that would render existing permit compliance terms and conditions irrelevant.
[(WAC 173-401-725(4)(a)]

4.14 Monitoring and Associated Recordkeeping for Emission Units without Continuous Operation

1. For Emission Units with Non-radioactive Air Emission Conditions

The permittee is not required to conduct the monitoring and associated recordkeeping for any emission unit if the emission unit did not operate at any time between required monitoring events (e.g., if the monitoring requires recording pressure drop daily, such readings would not be required on any full day in which the emission unit did not operate), provided the following conditions are met:

a) In the case of a permanent shutdown of the emission unit:

i) the permittee makes a contemporaneous record in a log or file maintained on site of the date and time that the emission unit ceased operation.

ii) within 30 days of ceasing operation, the permittee provides written notice to Ecology of the date and time the emission unit ceased operation.

b) In the case of a temporary shutdown of the emission unit:

i) the permittee makes a contemporaneous record in a log or file maintained on site of the date and time that the emission unit ceased operation and the reason why the emission unit did not operate.

ii) the permittee makes a contemporaneous record in a log or file maintained on site of the date and time that the emission unit resumed operation.

iii) the periodic report of monitoring required by Standard Terms and Conditions Section 4.3.3, *Semiannual Reports* and/or the specific permit condition includes a summary of the period or periods when the emission unit did not operate.

2. For Emission Units with Radioactive Air Emission Conditions

The licensee is not required to conduct the monitoring and associated recordkeeping for any emission unit if the emission unit did not operate at any time between required monitoring events (e.g., if the monitoring requires continuous sampling, such readings would not be required on any full day in which the emission unit did not operate), provided the following conditions* are met:

In the case of a permanent shutdown of the emission unit:

- i) the licensee completes the monitoring and associated recordkeeping for that period prior to the shutdown.
- ii) the licensee files a report of closure with the Department of Health in accordance with WAC 246-247-080(6). An emission unit will not be considered to be permanently shut down or completed until a report of closure is received by the Department of Health.

* Note: These conditions do not apply to temporary radioactive emission units (e.g., HEPA Vacuums or PTRAEUs, etc).

1. Emission Standards and Limitations

1.1 Insignificant Emission Units

Compliance with the cited applicable requirements in Table 1.2 (see Section 1.3) is required. However, the periodic monitoring, testing, recordkeeping, or reporting requirements listed in Table 1.2 are not required. Also the compliance certification is not required for insignificant emission units.

All emission units not identified in Table 1.1 are subject to 40 CFR 61 Subpart H (see Attachment 2) have been determined to represent insignificant sources of non-radioactive regulated air pollutants. For these emission units no additional monitoring, reporting, or recordkeeping is necessary to determine compliance with the requirements in Table 1.2. These emission units need not be individually listed in the annual compliance certification unless there were observed, documented, or known instances of non-compliance during the certification period. All requirements identified in Attachment 2 for this category of emission unit continue to apply, as well as the requirement to annually certify compliance to any applicable requirements identified in Attachment 2.

[WAC 173-401-530(2)(b) and (2)(c)]

1.2 Emission Units And Activities Subject To Monitoring, Reporting, Recordkeeping, and Compliance Certification

Table 1.1 identifies those emission units on the Hanford Site subject to the requirement to annually certify compliance with the terms and conditions of this permit. The emission units listed in this table are subject to the generally applicable requirements in Table 1.2 (see Section 1.3) unless emission unit-specific requirements for these emission units are found in Tables 1.3, 1.4, 1.5, 1.6, or 1.7.

TABLE 1.1. LIST OF SIGNIFICANT EMISSION UNITS

Fossil-Fuel Fired Steam Generating Units (See Table 1.3 for applicable requirements)				
200 Area/300 Area Steam Generating Units				
Boiler Annex		Boiler HP	Fuel	Subject to WAC 173-400-115, Subpart Dc, Standards of Performance for New Sources
200CC	Boiler 1	80	fuel oil	No
225-B	Boiler 1	150	fuel oil	No
275-E	Boiler 1	80	fuel oil	No
272-W	Boiler 1	250	fuel oil	No
222-S	Boiler 1	200	fuel oil	No
	Boiler 2	200	fuel oil	No
283-W	Boiler 1	200	fuel oil	No
283-E	Boiler 1	200	fuel oil	No
234-5Z	Boiler 1	350	fuel oil	Yes
	Boiler 2	350	fuel oil	Yes
	Boiler 3	350	fuel oil	Yes
242-A	Boiler 1	200	fuel oil	No

EMSL (See Table 1.6 for applicable requirements)			
Emission Point ID	Boiler Rating	Fuel	Subject to WAC 173-400-115, Subpart Dc, Standards of Performance for New Sources
300 EP-3020-07-S	5.0 MMBTU/hr	natural gas (fuel oil backup)	No
300 EP-3020-08-S	5.0 MMBTU/hr	natural gas (fuel oil backup)	No
300 EP-3020-09-S	5.0 MMBTU/hr	natural gas (fuel oil backup)	No

Internal Combustion Engines, 500 Horsepower and Greater: (See Table 1.4 for applicable requirements)	
200E E-225BC 001	400 E-408A-001 Q-1
200E E-225BG 001	400 E-408A-002 Q-2
200E E-282ED 001, Engine E (See Table 1.6)	400 E-408A-003 Q-3
200W E-282WD 001, Engine W (See Table 1.6)	400 E-408A-004 Q-4
300 E-900 001	400 E-408B-001 Q-5
300 E-1000 001	400 E-408B-002 Q-6
300 E-900 002	400 E-408B-003 Q-7
300 E-1450 001	400 E-408B-004 Q-8
300 E-900 003	400 E-408C-001 Q-9
300 EP-3020-12-S (See Table 1.6)	400 E-408C-002 Q-10
400 E-1500 001, DG-1	400 E-408C-003 Q-11
400 E-1500 002, DG-2	400 E-408C-004 Q-12
400 E-4250 001, G-3	
600 E WSCF 001	

1.3 General Standards for Maximum Emissions

The following general regulatory requirements, emission limits, or work practice standards apply to all emission units [see definition of emission units in WAC 173-401-200(11)] on the Hanford Site.

The general standards in Table 1.2 are the applicable requirement, emission limit, or work practice standard unless replaced by another requirement in Tables 1.3, 1.4, 1.5, 1.6 or 1.7.

TABLE 1.2. GENERAL STANDARDS FOR MAXIMUM EMISSIONS

Requirement Citation (WAC or Order Citation)	Regulatory Requirement, Emission Limit, or Work Practice Standard	State Only Enforceable	Periodic Monitoring	Periodic Monitoring Provisions	Test Method ¹
WAC 173-400-040(1)	20% Opacity Prohibits visible emissions exceeding 20% opacity for more than 3 minutes in any 1 hour of an air contaminant from any emissions unit or within a reasonable distance of the emission unit except for scheduled soot blowing/grate cleaning or due to documented water.	N (See 2.8)	Visible Emission Surveys	2.1	Ecology Method 9A
WAC 173-400-040(2)	Fallout Prohibits emissions of particulate matter from any source to be deposited beyond the facility boundaries in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited.	Y	Recordkeeping of complaint investigation	2.2	
WAC 173-400-040(3)(a)	Fugitive emissions The permittee shall take reasonable precautions to prevent the release of air contaminants from any emissions unit engaging in	N	Pre-job planning to determine reasonable control measures ²	2.3	

Requirement Citation (WAC or Order Citation)	Regulatory Requirement, Emission Limit, or Work Practice Standard	State Only Enforceable	Periodic Monitoring	Periodic Monitoring Provisions	Test Method ¹
	materials handling, construction, demolition, or any other operation that is a source of fugitive emissions.				
WAC 173-400-040(4)	Odor Requires any facility causing an odor that unreasonably interferes with another person's use and enjoyment of their property to use recognized good practices and procedures to reduce odors to a reasonable minimum.	Y	Recordkeeping of complaint investigations	2.2	
WAC 173-400-040(5)	Emissions detrimental to persons or property Prohibits emissions of any air contaminant from any source which is detrimental to the health, safety, or welfare of any person, or causes damage to property or business	N	Recordkeeping of complaint investigation	2.2	
WAC 173-400-040(6)	1000 ppm SO ₂ @ 7% O ₂ on a dry basis Prohibits emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of a dry basis, corrected to 7% oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes.	N (see 2.9)	For fossil-fuel combustion units: Recordkeeping or certification	2.7	EPA Method 6 or 6C of 40 CFR 60, App. A
WAC 173-400-040(7)	Concealment and masking Prohibits the installation or use of any device or use of any means that conceals or masks an emission of an air	N	Recordkeeping of complaint investigation	2.2	

Requirement Citation (WAC or Order Citation)	Regulatory Requirement, Emission Limit, or Work Practice Standard	State Only Enforceable	Periodic Monitoring	Periodic Monitoring Provisions	Test Method ¹
	contaminant that would otherwise violate any provision of WAC 173-400.				
WAC 173-400-040(8)(a)	Fugitive dust Requires reasonable precautions be taken to prevent fugitive dust from becoming airborne and to minimize dust generation.	N	Pre-job planning to determine reasonable control measures ²	2.3	
WAC 173-400-040	Reasonably available control technology (RACT)	N	Permit terms considered RACT ³	2.4	

-
1. The Test Methods identified in this table are used as compliance verification tools. A frequency is not applicable unless specified in the table.
 2. These requirements do not apply to emissions that pass through a stack, chimney, vent, or other functionally equivalent opening.
 3. Applies only to regulatory order approval conditions shown in the following tables and not to the General Standards.

Process: Internal Combustion Engines

TABLE 1.4. INTERNAL COMBUSTION ENGINES: 500 HORSEPOWER AND GREATER

Discharge Point Number	Requirement Citation (WAC or Order Citation)	Regulatory Requirement, Emission Limit or Work Practice Standard	State Only Enforceable	Periodic Monitoring	Test Method ¹
200E E-225BC 001 200E E-225BG 001 300 E-900 001 300 E-1000 001 300 E-900 002 300 E-1450 001 300 E-900 003 400 E-1500 001, DG-1 400 E-1500 002, DG-2 400 E-4250 001, G-3 600 E WSCF 001	WAC 173-400-040(1)	20% Opacity Prohibits visible emissions exceeding 20% opacity for more than 3 minutes in any 1 hour of an air contaminant from any emissions unit or within a reasonable distance of the emission unit except for scheduled soot blowing/grate cleaning or due to documented water.	N (see 2.8)	Method: See Section 2.1, Tier 1 Frequency: At least once per calendar quarter, if operated.	Ecology Method 9A
400 E-408A-001 Q-1 400 E-408A-002 Q-2 400 E-408A-003 Q-3 400 E-408A-004 Q-4 400 E-408B-001 Q-5 400 E-408B-002 Q-6 400 E-408B-003 Q-7 400 E-408B-004 Q-8 400 E-408C-001 Q-9 400 E-408C-002 Q-10 400 E-408C-003 Q-11 400 E-408C-004 Q-12	WAC 173-400-040(6)	1000 ppm SO ₂ @ 7% O ₂ on a dry basis Prohibits emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of a dry basis, corrected to 7% oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes.	N (see 2.9)	See Section 2.7, Tier 1.	EPA Method 6 or 6C of 40 CFR 60, App. A

¹ The Test Methods identified in this table are used as compliance verification tools. A frequency is not applicable unless specified in the table.

TABLE 1.7 MISCELLANEOUS EMISSION UNITS

Discharge Point Number	Requirement Citation	Regulatory Requirement Excluding Limitation or Other Exemption Standard
Hanford Site Asbestos Landfill	40 CFR 61.151(a)(3)	Cover asbestos-containing waste with at least 60 centimeter of compacted nonasbestos-containing material, and maintain to prevent exposure.
	40 CFR 61.151(d)	Notify in writing at least 45 days prior to excavation. If construction will begin on a date other than the one in the original notice, notice of the new date must be provided at least 10 working days in advance. (1) Notice shall contain starting and completion dates. (2) Notice shall contain reason for disturbing the waste. (3) Notice shall contain procedures to be used to control emissions (4) Notice shall contain a location for any temporary storage site and the final disposal site.
	WAC 173-400-040(1)	<i>Permittee is considered to be in compliance if no complaints are forwarded to or generated by Ecology.</i>
	WAC 173-400-040(6)	<i>Monitor per Section 2.7, Tier 2.</i>
181B-66 Underground Storage Tank	40 CFR 60.116(b)	Keep readily accessible records showing the dimension of the storage vessel and analysis showing capacity
	WAC 173-400-040(1)	<i>Permittee is considered to be in compliance if no complaints are forwarded to or generated by Ecology.</i>
	WAC 173-400-040(6)	<i>Monitor per Section 2.7, Tier 2.</i>
600 Area Gas Distribution	WAC 173-491-040(4)(b)	All gasoline storage tanks shall be equipped with submerged or bottom fill lines and fittings to vapor balance gasoline vapors with the delivery transport tank.
	WAC 173-491-040(4)(d)	The owner or operator shall not permit the loading of gasoline into a storage tank equipped with vapor balance fittings from a transport tank equipped with vapor balance fittings unless the vapor balance system is attached to the transport tank and operated satisfactorily.
	WAC 173-491-040(6)(d)	Recordkeeping.
	WAC 173-400-040(1)	<i>Permittee is considered to be in compliance if no complaints are forwarded to or generated by Ecology.</i>
	WAC 173-400-040(6)	<i>Monitor per Section 2.7, Tier 2.</i>
283-W Water Treatment Plant (Chlorine Tank)	40 CFR 68.190(b)(3)	Evaluate 283-W for compliance with newly regulated substances above the threshold (revise Risk Management Plan if needed).
	40 CFR 68.190(b)(7)	Evaluate 283-W for change in Program Level within 6 months after any change.
	40 CFR 68.190(c)	Evaluate 283-W for applicability of 40 CFR 68.
	40 CFR 68.190(b)(6)	Evaluate 283-W for change that requires a revised consequence analysis.
	40 CFR 68.95(a)	Confirm that the required emergency response program has been developed and implemented.
	40 CFR 68.95(a)(4)	Confirm that the required procedures are in place to review and update the emergency response plan to reflect changes at the stationery source.
	40 CFR 68.12(b)(3)	Confirm that emergency response actions have been coordinated with local emergency planning and response agencies.
	40 CFR 68.39(a) to (e)	Confirm that records are being maintained for the offsite consequence analysis.
	WAC 173-400-040(1)	<i>Permittee is considered to be in compliance if no complaints are forwarded to or generated by Ecology.</i>
	WAC 173-400-040(6)	<i>Monitor per Section 2.7, Tier 2.</i>

2. Compliance and Periodic Monitoring Provisions

- 2.1 Visible emission surveys must be conducted during daylight hours and during periods when the emission unit is operating

Tier 1

This method applies primarily to fossil-fuel combustion units and other emission units that may be a source of visible emissions. The method consists of operating personnel observing visible emissions from the emission unit according to the frequency identified in the table. If the operator observes visible emissions for more than 10 consecutive minutes during the observation period, the cause(s) of the visible emissions will be determined and corrective actions taken as necessary, or a visible determination of opacity will be performed using Ecology Method 9A. Records of corrective actions taken to reduce opacity shall be maintained and available for Ecology inspection..

Tier 2

Some emission units are unlikely sources of visible emissions and are not expected to exceed their applicable opacity limit based on past operating experience and/or expected process behavior. These emission units include research and development laboratories, analytical laboratories, and small natural gas-fired boilers. For these emission units, a surveillance will be conducted and the results recorded. If visible emissions from one of these emission units are observed for more than 10 consecutive minutes, an attempt to identify the cause(s) of the visible emissions will be made and those results recorded. The recorded entry will also identify any corrective actions taken and the likely frequency of a future reoccurrence. If the event is likely to be reoccurring, and cannot be demonstrated to consist of water vapor, then a determination of opacity will be made using Ecology Method 9A. The frequency of the visible emission surveys shall be as required in the table unless the following procedure has been satisfactorily completed. *Where no frequency is specified, visible emission surveys will be performed once per year.*

Procedure for reducing visible emission survey frequencies.

If weekly visible emission surveys for 3 months are negative, then quarterly measurements will be taken for the next six months. After *nine months* of no visible emissions, visible emission surveys will be performed only when visible emissions are observed or expected (e.g., during startup, shutdown, or periods of malfunction). Visible emission surveys during these periods will be conducted for non-radionuclide-emitting stacks according to the process described in Tier 2 above.

Tier 3

Maintain abatement control technology as required in Attachment 2, Tables 1.1, 1.2 and 2.1, for that particular emission unit.

- 2.2 Complaints forwarded by Ecology shall be addressed promptly and assessed for corrective action. An initial, informal response shall be made to Ecology within *30 days* of the permittee receiving the complaint. This initial response shall document preliminary investigation results and any planned or completed corrective actions. Follow-up report(s) shall be provided as directed by Ecology. The permittee shall maintain records of complaints forwarded by Ecology.

Emission Point	Project	Permit No	Conditions
300 EP-3020-02-S through -06-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08 (Effective: 9-13-1994)	(Complete) 5. Energy shall submit normal emissions and revised maximum emissions for all TAP released from each of five chemical stacks to Ecology within 15 months after the EMSL starting operation.
300 EP-3020-01-S through -12-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08 (Effective: 9-13-1994)	(Complete) 8. Energy shall notify Ecology in writing at least 30 days before operational start-up of these proposed air emission control systems.
300 EP-3020-01-S through -12-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08 (Effective: 9-13-1994)	(Obsolete 6-9-2000) 1. Environmental Molecular Sciences Laboratory (EMSL) research projects, supporting operations, and building equipment additions and changes including control systems, can be made to accommodate changing research and support requirements. These changes can be made without filing a Notice of Construction.
300 EP-306W-03-V	Operation of Material Development Laboratory and Catalytic Electrochemical Oxidation Unit (CEO)	DE 98NWP-002	Obsolete NOC
300 EP-324-01-S	324 building modification	NWP 95-300/324 Lab	Obsolete NOC
300 EP-324-01-S	Operation of a Plasma Arc Furnace in the 324 Building	NWP-96-2	Obsolete NOC
300 EP-325-01-S	325 Building Hazardous Waste Treatment Unit (HWTU)	DE 98NWP-004	Condition completed 10/17/01: General Testing Requirements: Perform initial source test for Volatile Organic Compounds (VOCs). DOE-RL shall demonstrate initial compliance for VOCs through source tests conducted no later than 180 days after start-up of the proposed HWTU/SAL activities. EPA Reference Method 25A shall be followed for testing. The test plan shall be submitted to Ecology upon request. After source tests are completed, mass balance calculations will be accepted for compliance purposes.

- **Kaiser Aluminum and Chemical Corporation extrusion press located in the 313 Building**

This facility produces aluminum baseball bats for sale to the general public, does not supply any USDOE related services, and is not under the "common control" of USDOE.

- **Siemens Power Corporation, Nuclear Division**

Siemens Power Corporation operates a commercial nuclear fuel fabrication facility near the southern boundary of the Hanford Site.

The Siemens facility does not supply any USDOE related services, and is not under the "common control" of USDOE.

- **Livingston Rebuild Center, Inc.**

USDOE signed a lease in March 1998 with Livingston Rebuild Center, a major railroad locomotive repair firm from Livingston, Montana for about one quarter of Hanford's 1171 Transportation Maintenance Building. Livingston Rebuild Center rebuilds locomotives and locomotive components for customers throughout the U.S., Canada and Mexico. The company is not under the "common control" of USDOE.

- **PN Services**

PN Services is a subsidiary of Westinghouse Electric Company, specializing in chemical cleaning, chemical decontamination, and related chemical and waste processing services for the nuclear industry. PN services was originally formed in May 1983 as the PN Services division of Pacific Nuclear. In January 1992, Pacific Nuclear was renamed VECTRA Technologies and the PN Services division became the Plant Services Group of VECTRA. On June 30, 1995, the Plant Services Group was acquired by Westinghouse. This acquisition merged the chemical decontamination and chemical cleaning capabilities of Westinghouse and VECTRA Plant Services Group into a single company, PN Services. The company has its executive engineering office, service facility and chemical laboratory in Richland, WA, and its sales office and other service facility in Spartanburg, SC.

12. Notification of regulatory order (NOC) approval conditions

Table 1.6, Emission Limits and Periodic Monitoring Requirements for Emission Units With NOC Approval Conditions, includes only the emission limits and conditions identified in the "Approval Conditions" section of the regulatory orders. Information included in other sections of the orders, such as "Findings," "Background," "Description" or similarly titled sections are not included in Table 1.6.

13. Compliance with general standards for odor.

Section 1.3, Table 1.2, General Standards for Maximum Emissions, requires that the permittee use good practice and procedures to reduce odorous emissions to a reasonable minimum. Based on process knowledge and the lack of odor complaints filed with the regulatory agencies, Ecology has determined that the Hanford Site is not a source of odorous emissions. For these reasons, the complaint response program for odor control described in Table 1.2 is considered adequate to maintain odorous emissions at a reasonable minimum.

14. Compliance with general standards for fugitive emissions and fugitive dust.

Section 1.3, Table 1.2, General Standards for Maximum Emissions, requires that the permittee use reasonable precautions to control fugitive emissions and fugitive dust. The Hanford Site is not generally a source of fugitive dust and emissions, except during construction and demolition activities. Most of the construction activities occur in areas of the Hanford Site remote from site boundaries. The Hanford Site uses a system of pre-job planning and job safety analysis to reasonably control these emissions. Emissions that pass through a stack are not sources of fugitive emissions [WAC 173-400-030(32)] or fugitive dust [WAC 173-400-030(31)].

Enclosure 2

Department of Energy's Request for Significant Modification to the Hanford Site Title V
Air Operating Permit, 02-RCA-0327, May 3, 2002.

Consisting of 16 pages



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAY 03 2002

Central Files NYI
File Name: _____
Cross Reference: _____

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MAY - 8 2002

Department of Ecology
NWP Kennewick

02-RCA-0327

Mr. O. S. Wang
Nuclear Waste Program
Washington State Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

Mr. A. W. Conklin, Manager
Air Emissions and Defense Waste Section
Division of Radiation Protection
Washington State Department of Health
Olympia, Washington 98504-7827
Post Office Box 47827

Dear Messrs. Wang and Conklin:

**REQUEST FOR SIGNIFICANT MODIFICATION AND ADMINISTRATIVE AMENDMENT
TO THE HANFORD SITE TITLE V AIR OPERATING PERMIT (AOP) (NUMBER
00-05-006)**

Enclosed is a request for an Administrative Amendment and a Significant Modification to the Hanford Site Title V AOP pursuant to Washington Administrative Code (WAC) 173-401-720 and WAC 173-401-725(4). The changes are described and explained in the enclosures. The Administrative Amendment (Enclosure 1) request identifies numerous changes to the permit to bring it up to date (address changes, change of emission point names to be consistent with current site nomenclature) and to clarify issues that have arisen during the certification process.

The Significant Modification (Enclosure 2) contains changes that are related to monitoring, reporting frequencies, and/or recordkeeping. The Significant Modification also contains both the addition of new sunseting language for monitoring and associated recordkeeping requirements for emission units that are not operating, and a clarification of visible emissions compliance standard for the following:

- Hanford Site Asbestos Landfill
- 181 B-66 Underground Storage Tank
- 600 G-6290 600 Area Gas Distribution
- 283-W Water Treatment Plant (Chlorine Tank)

Also included in the Significant Modification is a form titled "Notification of Permit Modification Request to the U.S. Environmental Protection Agency, Region 10, the Tribes, and Affected States."

Addressees
02-RCA-0327

-2-

MAY 03 2002

If you have any questions, please call Astrid P. Larsen, of my staff, on (509) 372-0477.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:APL

Enclosures

cc w/o encls:

B. P. Atencio, PNNL
W. T. Dixon, CHG
D. J. Edwards, PNNL
R. H. Engelmann, FH
R. Gay, CTUIR
R. H. Gurske, FH
R. Jim, YN
R. J. Landon, BHI
C. M. Lawrence, WDOH
J. J. Luke, CHG
D. Sobotta, NPT
J. G. Woolard, BHI
Environmental Portal, A3-01

Enclosure 1

**Hanford Site Title V Air Operating Permit
Request for Administrative Amendment to AOP Attachment 1, Section 1.1, Table 1.7, and
Section 2.1**

Consisting of 6 pages, including coversheet

Request for Administrative Amendments to the Hanford Site Air Operating Permit

AOP Standard Terms and Conditions

Page 9, Add PN Services as last entry in bullet list.

AOP General Conditions

Pages 13 and 15, Change Benton Clean Air Authority mailing address to 114 Columbia Point Drive, Suite C.

Page 20 and 21, Delete Section 4.7 *Off-Permit Changes* and Section 4.8 *Changes Not Requiring a Permit Revision*. Guidance has been developed to address these circumstances.

AOP Attachment 1

Section 1.3, Table 1.2 *General Standards for Maximum Emissions*, add footnote to fugitive emissions and fugitive dust monitoring requirement to clarify that these requirements do not apply to emissions that pass through a stack. A copy of Table 1.2 with the text changes is provided below.

Section 1.3, Table 1.2 *General Standards for Maximum Emissions*, change Reasonable Achievable Control Technology monitoring requirement to clarify applicable permit conditions. A copy of Table 1.2 with the text changes is provided below.

AOP Attachment 2

Pages 2-13, 2-40 and 2-60, change emission point names for Cold Vacuum Drying facility, Canister Storage Building, and Waste Receiving and Processing facility to reflect the current site nomenclature. The correct emission point names are 100K P-296K142 (Emission Unit ID: 436), 200E P-296H212 (Emission Unit ID: 435), and 200W P-296W004 (Emission Unit ID: 193).

Page 2-40, Monitoring Requirements, Sampling Frequency. This condition is truncated. Please provide the full text of the sampling frequency requirement.

Page 2-228, Delete emission unit 200 J-NONPOINT 018, Grout Railcar Emission Unit ID: 460 from the permit. This emission unit is obsolete and there are no monitoring requirements or conditions listed.

Page 2-228, 200 J-NONPOINT 012, Emission Unit ID: 460, Teleconference 4/29/1999, Condition 1 is truncated. Add "99-101" to complete the sentence.

Delete the following NOCs from the permit. None of the NOCs listed below have conditions to which to certify compliance.

Pages 2-114, 116, 117, 118, NOC revision approval, 1/19/99, NOC ID 331
This NOC contains no new WDOH conditions but states that the conditions from the 1/14/97 RTAM (NOC ID 211) are applicable. The 1/14/97 RTAM conditions are included in the permit.

Page 2-43, AIR 99-501, 5/19/99, NOC ID 369

Page 2-220, RTAM, 7/13/99, NOC ID 377

Page 2-60, RTAM, 7/9/96, NOC ID 171

Delete Condition 1. This is a description and has no requirement to which to certify compliance.

Page 2-61, AIR 93-907, 9/7/93, NOC ID 23

Delete Condition 1. This is a process description and has no requirement to which to certify compliance.

RTAM, 1/14/97, NOC ID 211

The entire list of conditions from this NOC was printed in full with each emission point to which a condition is applicable. This is confusing for compliance certification. The following list outlines the reassignment of the conditions to the emission point to which the condition applies.

Pages 2-114, 115, Emission Point 200E P-2025 ETF (Effluent Treatment Facility) Emission Unit ID 301

Delete conditions 1, 2, 4, and 5.

Pages 2-116, Emission Point 200E P-242AL42-001 (LERF Basin #42) Emission Unit ID 148

Delete conditions 1, 2, 3, and 4.

Pages 2-117, Emission Point 200E P-242AL43-001 (LERF Basin #43) Emission Unit ID 147

Delete conditions 1, 2, 3, and 4.

Pages 2-118, Emission Point 200E P-242AL44-001 (LERF Basin #42) Emission Unit ID 146

Delete conditions 1, 2, 3, and 4.

Page 2-233, Emission Point 200E J-NONPOINT 021, (ETF Load-In Station Filter Skid), Emission Unit ID 481

This Emission Unit has 2 active Notice of Construction.

Add:

RTAM, 1/14/97, NOC ID 211

1. ETF Load-in station and LERF = $2.50 \text{ E-}02 \text{ mrem/yr}$ to the MEI.

Suggested text changes: as noted above and Table 1.2 that follows.

Section 1.3, Table 1.2 *General Standards for Maximum Emissions*

Requirement Citation (WAC or Order Citation)	Regulatory Requirement, Emission Limit, or Work Practice Standard	State Only Enforceable	Periodic Monitoring	Periodic Monitoring Provisions	Test Method ¹
WAC 173-400-040(1)	<p>20% Opacity</p> <p>Prohibits visible emissions exceeding 20% opacity for more than 3 minutes in any 1 hour of an air contaminant from any emissions unit or within a reasonable distance of the emission unit except for scheduled soot blowing/grate cleaning or due to documented water.</p>	N (See 2.8)	Visible Emission Surveys	2.1	Ecology Method 9A
WAC 173-400-040(2)	<p>Fallout</p> <p>Prohibits emissions of particulate matter from any source to be deposited beyond the facility boundaries in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited.</p>	Y	Recordkeeping of complaint investigation	2.2	
WAC 173-400-040(3)(a)	<p>Fugitive emissions</p> <p>The permittee shall take reasonable precautions to prevent the release of air contaminants from any emissions unit engaging in materials handling, construction, demolition, or any other operation that is a source of fugitive emissions.</p>	N	Pre-job planning to determine reasonable control measures ²	2.3	

Requirement Citation (WAC or Order Citation)	Regulatory Requirement, Emission Limit, or Work Practice Standard	State Only Enforceable	Periodic Monitoring	Periodic Monitoring Provisions	Test Method ¹
WAC 173-400-040(4)	Odor Requires any facility causing an odor that unreasonably interferes with another person's use and enjoyment of their property to use recognized good practices and procedures to reduce odors to a reasonable minimum.	Y	Recordkeeping of complaint investigations	2.2	
WAC 173-400-040(5)	Emissions detrimental to persons or property Prohibits emissions of any air contaminant from any source which is detrimental to the health, safety, or welfare of any person, or causes damage to property or business	N	Recordkeeping of complaint investigation	2.2	
WAC 173-400-040(6)	1000 ppm SO ₂ @ 7% O ₂ on a dry basis Prohibits emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of a dry basis, corrected to 7% oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes.	N (see 2.9)	For fossil-fuel combustion units: Recordkeeping or certification	2.7	EPA Method 6 or 6C of 40 CFR 60, App. A
WAC 173-400-040(7)	Concealment and masking Prohibits the installation of use of any device or use of any means that conceals or	N	Recordkeeping of complaint investigation	2.2	

Requirement Citation (WAC or Order Citation)	Regulatory Requirement, Emission Limit, or Work Practice Standard	State Only Enforceable	Periodic Monitoring	Periodic Monitoring Provisions	Test Method ¹
	masks an emission of an air contaminant that would otherwise violate any provision of WAC 173-400.				
WAC 173-400-040(8)(a)	Fugitive dust Requires reasonable precautions be taken to prevent fugitive dust from becoming airborne and to minimize dust generation.	N	Pre-job planning to determine reasonable control measures ²	2.3	
WAC 173-400-040 1 ⁴	Reasonably available control technology (RACT)	N	Permit terms considered RACT ³	2.4	

¹ The Test Methods identified in this table are used as compliance verification tools. A frequency is not applicable unless specified in the table.

² These requirements do not apply to emissions that pass through a stack, chimney, vent, or other functionally equivalent opening.

³ Applies only to regulatory order approval conditions shown in the following tables and not to the General Standards.

Enclosure 2

**Hanford Site Title V Air Operating Permit
Request for Significant Modification to the AOP**

Consisting of 7 pages, including coversheet

HANFORD SITE AIR OPERATING PERMIT

Significant Permit Modification Request

Permit Number 00-05-006

Significant permit modifications are allowed under WAC 173-401-725(4) for those modifications that do not meet the requirements for a minor permit modification or an administrative amendment.

Provide the following information pursuant to WAC-173-401-725(4)

Emission point identification and description of the change:

See attachment 1, Emission Point Identification and Description of the Change.

Describe the emissions resulting from the change:

There are no new emissions resulting from the changes described in this significant permit modification request.

Describe the new applicable requirements that will apply as a result of the change:

New applicable requirements include sunseting language for monitoring and associated recordkeeping requirements for emission units that are not operating.

Suggested Draft Permit Language:

for example:

- *Monitoring/PCM that will be used to support compliance determination/certification*
- *Description of air pollution control equipment (abatement technology)*
- *Other controls such as limits on inventory, process limits such as throughput, hours of operation, or acceptance criteria, or other assumptions used in Potential to Emit calculations*
- *Other process descriptions that constitute a term or condition, such as reporting or recordkeeping requirements.*

See attachment 2, Suggested Draft Permit Language for Sunsetting Conditions

**Attachment 1:
Emission point identification and description of the change**

General permit changes not associated with specific emission units are identified below. These changes are included in this Significant Permit Modification request because they address permit conditions related to monitoring and/or reporting frequencies.

AOP General Conditions

Add Sunsetting language as Section 4.16 of the General Conditions of the permit to clarify monitoring and associated recordkeeping requirements for emission units that are not operating.

Change Section 4.3.3 (5) to remove the requirement to send the NOC approvals back to the regulatory agencies.

Delete Section 4.3.3 (6) as EPA approvals are not tracked anywhere in the AOP.

AOP Attachment 1 (Ecology)

Correct typographical error by changing "3 days" to "30 days" in the second sentence of Section 2.2, page 1-46.

The following permit changes are associated with specific emission units.

AOP Attachment 1 (Ecology)

Hanford Site Asbestos Landfill
181 B-66 Underground Storage Tank
600 G-6290 600 Area Gas Distribution
283-W Water Treatment Plant (Chlorine Tank)

Change the visible emission surveys monitoring requirements in *Table 1.7, Miscellaneous Emission Units*, page 1-45 as the identified emission units are extremely unlikely sources of visible emissions and no visible emissions have been observed during the numerous visible emission surveys completed during the compliance period.

AOP Attachment 2 (WDOH)

200 P-276S141 001, page 2-81, Emission Unit ID: 482
Remove all monitoring requirements as the characterization activities that the monitoring applies to have been completed.

200 W-PORTEX-023, page 2-83, Emission Unit ID: 479
Delete this emission unit from the permit because this portable exhauster has been replaced.

200E P-244AR-002, page 2-113, Emission Unit ID: 211

200W P-213W-001, page 2-159, Emission Unit ID: 308

Delete these emission units from the permit because "this unit is inactive and will require a NOC to resume operation or ma report of closure to deregister."

300 diffuse/fugitive emissions, Emission Unit ID: 443

Delete NOC, Shortform Approval, 7/7/99, WDOH NOC ID 375, page 2-223, from permit because the activity has been completed.

300 P-309PRTR-001, page 2-163, Emission Unit ID: 195

Delete this emission unit from the permit because a letter of closure (02-RCA-0185) has been mailed.

300 EP-3020-01-S, Emission Unit ID: 307

Delete NOC, Shortform Approval, 12/16/97, WDOH NOC ID 248, page 2-180, from permit because the NOC has never been used and there are no plans to use it in the future.

Hanford Sitewide W-PORTEX 007, Emission Unit ID: 455

Delete NOC, ERC Team Meeting (Minutes CCN 053924), 10/24/97, WDOH NOC ID 239, page 2-203, from permit because the NOC has never been used and there are no plans to use it in the future.

Attachment 2
Suggested Draft Permit Language for Sunsetting Conditions

4.16 Monitoring and Associated Recordkeeping for Emission Units without Continuous Operation

1. For Emission Units with Non-radioactive Air Emissions Conditions

The permittee is not required to conduct the monitoring and associated recordkeeping for any emission unit if the emission unit did not operate at any time between required monitoring events (e.g., if the monitoring requires recording pressure drop daily, such readings would not be required on any full day in which the emission unit did not operate), provided the following conditions are met:

- a) in the case of a permanent shut down of the emission unit:
 - i) the permittee makes a contemporaneous record in a log or file maintained on site of the date and time that the emission unit ceased operation.
 - ii) within 30 days of ceasing operation, the permittee provides written notice to Ecology of the date and time the emission unit ceased operation.

- b) in the case of a temporary shut down of the emission unit:
 - i) the permittee makes a contemporaneous record in a log or file maintained on site of the date and time that the emission unit ceased operation and the reason why the emission unit did not operate.
 - ii) the permittee makes a contemporaneous record in a log or file maintained on site of the date and time that the emission unit resumed operation.
 - iii) the periodic report of monitoring required by Standard Terms and Conditions Section 4.3.3, *Semiannual Reports* and/or the specific permit condition includes a summary of the period or periods when the emission unit did not operate.

2. For Emission Units with Radioactive Air Emission Conditions

The licensee is not required to conduct the monitoring and associated recordkeeping for any emission unit if the emission unit did not operate at any time between required monitoring events (e.g., if the monitoring requires continuous sampling, such readings would not be required on any full day in which the emission unit did not operate), provided the following conditions are met:

- a) in the case of a permanent shut down of the emission unit:
- i) the licensee completes the monitoring and associated recordkeeping for that period prior to the shutdown.
 - ii) the licensee files a report of closure with the Department of Health in accordance with WAC 246-247-080(6). An emission unit will not be considered to be permanently shut down or completed until a report of closure is received by the Department of Health.

Note: These conditions do not apply to temporary radioactive emissions units (e.g., HEPA Vacuums or PTRABUs, etc).

Suggested Draft Permit Language for Section 4.3.3(5)

5. Each semiannual report will list any new regulatory orders, (e.g. Notice of Construction) imposed during the reporting period by Ecology or Health.

Suggested Draft Permit Language for Attachment 1, Table 1.7 Miscellaneous Emission Units

Table 1.7 Miscellaneous Emission Units

Discharge Point Number	Regulatory Citation	Regulatory Requirements, Emission Limits, or Test Procedure Standard
Hanford Site Asbestos Landfill	40 CFR 61.151(a)(3)	Cover asbestos-containing waste with at least 60 centimeter of compacted nonasbestos-containing material, and maintain to prevent exposure.
	40 CFR 61.151(d)	Notify in writing at least 45 days prior to excavation. If construction will begin on a date other than the one in the original notice, notice of the new date must be provided at least 10 working days in advance. (1) Notice shall contain starting and completion dates. (2) Notice shall contain reason for disturbing the waste. (3) Notice shall contain procedures to be used to control emissions (4) Notice shall contain a location for any temporary storage site and the final disposal site.
	WAC 173-400-040(1)	Permittee is considered to be in compliance if no complaints are forwarded or generated by Ecology.
	WAC 173-400-040(6)	Monitor per Section 2.7, Tier 2
181B-66 Underground Storage Tank	40 CFR 60.116(b)	Keep readily accessible records showing the dimension of the storage vessel and analysis showing capacity
	WAC 173-400-040(1)	Permittee is considered to be in compliance if no complaints are forwarded or generated by Ecology.
	WAC 173-400-040(6)	Monitor per Section 2.7, Tier 2

Discharge Point Number	Requirement Citation	Regulatory Requirement, Emission Limit, or Work Practice Standard
600 Area Gas Distribution	WAC 173-491-040(4)(b)	All gasoline storage tanks shall be equipped with submerged or bottom fill lines and fittings to vapor balance gasoline vapors with the delivery transport tank.
	WAC 173-491-040(4)(d)	The owner or operator shall not permit the loading of gasoline into a storage tank equipped with vapor balance fittings from a transport tank equipped with vapor balance fittings unless the vapor balance system is attached to the transport tank and operated satisfactorily.
	WAC 173-491-040(6)(d)	Recordkeeping.
	WAC 173-400-040(1)	Permittee is considered to be in compliance if no complaints are forwarded or generated by Ecology.
	WAC 173-400-040(6)	Monitor per Section 2.7, Tier 2
	283-W Water Treatment Plant (Chlorine Tank)	40 CFR 68.190(b)(3)
40 CFR 68.190(b)(7)		Evaluate 283-W for change in Program Level within 6 months after any change.
40 CFR 68.190(c)		Evaluate 283-W for applicability of 40 CFR 68.
40 CFR 68.190(b)(6)		Evaluate 283-W for change that requires a revised consequence analysis.
40 CFR 68.95(a)		Confirm that the required emergency response program has been developed and implemented.
40 CFR 68.95(a)(4)		Confirm that the required procedures are in place to review and update the emergency response plan to reflect changes at the stationary source.
40 CFR 68.12(b)(3)		Confirm that emergency response actions have been coordinated with local emergency planning and response agencies.
40 CFR 68.39(a) to (e)		Confirm that records are being maintained for the offsite consequence analysis.
WAC 173-400-040(1)		Permittee is considered to be in compliance if no complaints are forwarded or generated by Ecology.
WAC 173-400-040(6)		Monitor per Section 2.7, Tier 2

**NOTIFICATION OF PERMIT MODIFICATION REQUEST TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY,
REGION 10, THE TRIBES, AND AFFECTED STATES**

Attached is a request to revise the Hanford Site Air Operating Permit. This form serves as notification to EPA, tribes, and affected states of a request for an Air Operating Permit Modification per WAC 173-401-725(2), (3) and (4).

Air Operating Permit Number: 00-05-006	
Source: U.S. Department of Energy, Richland Operations, Hanford Site	
Mailing Address: P.O. Box 550 Richland, WA 99352	Physical Address: 825 Jadwin Ave. Richland, WA 99352
Brief Description: Addition of new sunseting language for monitoring and associated recordkeeping requirements for emission units that are not operating. Clarification of visible emissions compliance standard for Hanford Site Asbestos Landfill, 181 B-66 Underground Storage Tank, 600 G-6290 600 Area Gas Distribution, and 283-W Water Treatment Plant (Chlorine Tank) emission units. General permit changes that would be administrative amendments except the permit conditions being corrected are related to monitoring and/or reporting frequencies.	
Contact Name: Joel B. Hebdon	Phone: 509-372-2400
Title: Director, Regulatory Compliance and Analysis Division US Department of Energy, Richland Operations Office	
FOR ECOLOGY USE ONLY	
Application Number	Date Received
Ecology Contact	
Date of Publication in Permit Register	Public Comment Period Ends